

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DARYA DEARING, *et al.*,

Plaintiffs,

v.

IQVIA INC., *et al.*,

Defendants.

Case No: 1:20-cv-00574-WO-JEP

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiffs, Darya Dearing, Janice Gullick, Nelson Sievers and Lauren Brown (collectively, “Plaintiffs”), on behalf of the proposed Settlement Class (defined below) and the IQVIA 401(k) Plan (the “Plan”), hereby move pursuant to Federal Rule of Civil Procedure 23 for entry of an Order that: (1) preliminarily approves the Settlement with Defendants, IQVIA, Inc., the Board of Directors of IQVIA, and the Benefits Investment Committee (collectively, “Defendants”), as memorialized in the Settlement Agreement dated May 15, 2024 and exhibits thereto;¹ (2) finds that the Class may be maintained through such time as the Court enters an order granting final approval of the Settlement; (3) approves the proposed notice plan (“Notice Plan”) in the Settlement Agreement and proposed Preliminary Approval Order; and (4) sets a final approval hearing on a date

¹The Settlement Agreement and its exhibits are attached to the accompanying Declaration of Alec J. Berin. Terms not defined herein shall have the same meaning as in the Settlement Agreement.

convenient for the Court at least 140 days after the entry of a preliminary approval order.²

A proposed Preliminary Approval Order is attached as Exhibit C to the Settlement Agreement.

For the reasons set forth in the Settlement Agreement, accompanying memorandum of law and all supporting papers, as well as the record in this litigation, Plaintiffs respectfully submit that the Settlement is fair, reasonable, and adequate, and should be preliminarily approved so that notice can be provided to the Settlement Class. The Settlement is the product of arm's-length negotiations between the parties and their counsel, all of whom comprehensively litigated this matter, are well-informed regarding all the issues in this litigation, and have significant experience in complex litigation of this type.

Plaintiffs stand ready to provide any additional information that the Court may require in connection with its consideration of the Motion.

Dated: May 15, 2024

Respectfully Submitted,

/s/ Alec J. Berin

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²Counsel for Plaintiffs have conferred with counsel for Defendants and confirmed that the Motion is unopposed.

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*Attorneys for Plaintiffs, the Plan,
and the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that, on May 15, 2024, Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement was filed with the Court's electronic filing system, causing notice thereof to be sent to all parties for whom counsel has entered an appearance.

/s/ Alec J. Berin
Alec J. Berin
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